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April 26, 2017

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BY ECF

Honorable Robert W. Sweet United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007-1312

Re: Carlos Parra v. 42-15 235th Street Hospitality LLC, et al.

Index No. 16-cv-8079 (RWS)

Your Honor:

We represent Plaintiffs in the above-referenced matter. I write, with Defendants' consent, to respectfully request an extension of discovery which is set to be close by April 27, 2017. This is our first request for an extension of this deadline.

The parties have been coordinating and exchanging discovery, while also working diligently to explore the possibility of settlement. Counsel are in the process of discussing with our clients whether mediation would be helpful in this matter.

Additionally, I am taking over this case from Mr. Gerrald Ellis, who left the firm very recently. I would appreciate the additional time in order to acquaint myself with our client and the progress which has been made in this case.

We therefore respectfully request 46 days, until June 12, 2017, in order to complete paper discovery. We also therefore request that the proposed pretrial order be due July 12, 2017. This is the parties' first request for an extension of these deadlines.

We thank the Court for its attention to this matter.

Respectfully Submitted,

<u>/s/Marisol Santos</u>
Marisol Santos

cc: (By ECF) Douglas Evan Rowe, Esq. Elizabeth Erin Schlissel, Esq. Attorneys for Defendants